

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

AFT MICHIGAN,

Plaintiff,

v.

PROJECT VERITAS, et al,

Defendants.

Case No. 17-13292

Hon. Linda V. Parker

Hon. Elizabeth A. Stafford

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**PROJECT VERITAS PARTIES' RESPONSE TO  
AFT MICHIGAN'S MOTION TO COMPEL  
DISCOVERY OF THE NAMES OF PROJECT VERITAS DONORS  
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- Exhibit 1 Excerpts from Project Veritas Responses to AFT Michigan Requests for Production
- Exhibit 2 Excerpts of the deposition of James O’Keefe, January 24, 2020
- Exhibit 3 Excerpts of the deposition of Russell Verney, January 22, 2020
- Exhibit 4 Excerpts of the deposition of Marisa Jorge, December 10, 2019
- Exhibit 5 First Amended Complaint, *Planned Parenthood Federation of America, Inc., et al. v. Center for Medical Progress, et al.*, 16-cv-00236, Doc. No. 59 (N.D. Cal.)
- Exhibit 6 Affidavit of Russell Verney
- Exhibit 7 Affidavit of James O’Keefe with attachments
- Exhibit 8 Excerpts of the deposition of David Hecker, October 15, 2019
- Exhibit 9 Allysia Finley, *Randi Weingarten’s Enemies List*, WALL STREET J., Mar. 14, 2014
- Exhibit 10 Unreported rulings related to relevance under Fed. R. Civ. P. 26(b)(1):
- *Hemlock Semiconductor Corp. v. Kyocera Corp.*, 2016 WL 1660862 (E.D. Mich. Apr. 27, 2016)
  - *State Farm Mut. Auto. Ins. Co. v. Elite Health Centers, Inc.*, 2019 WL 2754653 (E.D. Mich. July 2, 2019)
- Exhibit 11 Unreported rulings related to qualified First Amendment privilege:
- *Tree of Life Christian Schools v. City of Upper Arlington*, 2012 WL 831918 (S.D. Ohio 2012)
  - *The Ohio Organizing Collaborative v. Husted*, 2015 WL 7008530 (S.D. Ohio 2015)
  - *In re Heartland Inst.*, 2011 WL 1839482 (N.D. Ill. May 13, 2011)

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con't

- *Dibbern v. Univ. of Mich.*, 2014 WL 4964463 (E.D. Mich. Oct. 3, 2014)
- *Anderson v. Hale*, 2001 WL 503045 (N.D. Ill. May 10, 2001)
- *Heartland Surgical Specialty Hosp., LLC v. Midwest Div., Inc.*, 2007 WL 852521 (D. Kan. Mar. 16, 2007)
- *Planned Parenthood Fed'n of Am., Inc. v. Ctr. for Med. Progress*, 2018 WL 2441518 (N.D. Cal. May 31, 2018)
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